August 15, 2011

The Honorable Esther Salas
United States District Court
Martin Luther King Jr. Federal Courthouse
50 Walnut St.
Newark, NJ 07102

Re: NVE Inc. v. Palmeroni Civil Action no. 06 -- 5455

Dear Judge Salas:

I write to ask Your Honor to vacate the default entered against my wife, Michele Hooey, and me. I'm also the only officer and member of codefendants Global Marketing and Sales Group and National Retail Consulting Group. I expect to retain counsel this week who will file a separate motion to vacate the default against them.

We had not appreciated the need to file an answer to the amended complaint for we had already answered the initial complaint. We were also confused because the amended complaint was served on a prior counsel about a month before they asked to be relieved. Further, because neither Michele nor I is trained in law, we did not know what we had to do. We have only been able recently to access the pacer system, and we did not receive electronic files from prior counsel until August 5th . I asked plaintiff's counsel for additional time, and they denied my request.

It is my decidedly uninformed opinion that, with the recent expansion of this case and the new discovery requirements necessary for each of the new defendants, that my oversights, small errors and inexperience with the judicial system in this instance will not result in a material delay of this case and have prejudiced no one. I take this case with the up most seriousness and have the highest respect for the court. My failures to date reflect inexperience and ignorance only.

Thank you for your time and consideration.

Joe Palmeroni

MIchele Hooey

413 route 940 #333

Michille Hooce

Mount Pocono, PA, 18344

psbsnve@gmail.com